

Presentment Date and Time: October 5, 2015 at 12:00 noon (Prevailing Eastern Time)

Objection Deadline: October 5, 2015 at 11:30 a.m. (Prevailing Eastern Time)

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Jayant W. Tambe
Laura W. Sawyer
Ryan J. Andreoli

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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	:	
In re:	:	Chapter 11
	:	
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:	Case No. 08-13555 (SCC)
	:	
Debtors.	:	(Jointly Administered)
	:	
-----X	:	

**NOTICE OF PRESENTMENT OF SECOND STIPULATED CLAIMS LITIGATION
SCHEDULE FOR THE OBJECTION OF DEBTORS AND DEBTORS IN POSSESSION
TO CLAIMS OF QVT FUND LP AND QUINTESSENCE FUND L.P.**

PLEASE TAKE NOTICE that the undersigned will present the annexed Second Stipulated Claims Litigation Schedule for the Objection of Debtors and Debtors in Possession to Claims of QVT Fund LP and Quintessence Fund L.P. (the "Claims Litigation Schedule") to the Honorable Shelley C. Chapman, United States Bankruptcy Judge, for signature on **October 5, 2015 at 12:00 noon (Prevailing Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that unless a written objection to the proposed Stipulated Scheduling Order, with proof of service, is served and filed with the Clerk of the Court and a courtesy copy is delivered to (i) the Bankruptcy Judge's chambers and (ii) the undersigned, so as to be received by **October 5, 2015 at 11:30 a.m. (Prevailing Eastern Time)**, the Stipulated Scheduling Order may be signed.

Dated: September 28, 2015
New York, New York

Respectfully submitted,

/s/ Ryan J. Andreoli

Jayant W. Tambe

Laura W. Sawyer

Ryan J. Andreoli

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In re:	:	Chapter 11
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	:	
Debtors.	:	(Jointly Administered)
-----X	:	

SECOND STIPULATED CLAIMS LITIGATION SCHEDULE

WHEREAS, on February 11, 2015, the Court so-ordered the Parties' stipulated Claims Litigation Schedule for the Objection of Debtors and Debtors in Possession to the Claims of QVT Fund LP and Quintessence Fund L.P. [Docket No. 48190] (the "Claims Litigation Schedule");

WHEREAS, the Parties have met and conferred and agreed to extend various deadlines in the Claims Litigation Schedule;

NOW, THEREFORE, the Parties hereby stipulate and agree to modify the Claims Litigation Schedule as follows:

1. All fact discovery shall be completed by February 12, 2016.
2. Initial document productions pursuant to agreed search terms and other agreements between the parties must commence on a rolling basis no later than October 12, 2015. The parties' document productions shall be substantially completed by November 6, 2015.
3. Privilege logs shall be served on or before December 7, 2016.
4. Depositions of fact witnesses must be completed no later than February 12, 2016.
5. Interrogatories pursuant to Local Bankruptcy Rule 7033-1(c) and requests for admissions will be served at least 30 days prior to close of discovery.

6. QVT shall disclose the identities of any of its testifying expert witnesses and serve any expert reports pursuant to Federal Rule of Civil Procedure 26(a)(2)(B) on March 11, 2016.

7. Depositions of experts disclosed pursuant to paragraph 6 must be completed no later than April 8, 2016.

8. Debtors shall disclose the identities of any of their testifying expert witnesses and serve any expert reports pursuant to Federal Rule of Civil Procedure 26(a)(2)(B) on May 13, 2016.

9. Depositions of experts disclosed pursuant to paragraph 8 must be completed no later than June 10, 2016.

10. The parties shall serve any rebuttal expert reports on July 8, 2016.

11. Depositions of experts disclosed pursuant to paragraph 10 must be completed no later than August 5, 2016.

12. As required by applicable rules, if a party wishes to file a dispositive motion, that party shall request a pre-motion conference with respect to such motion on or before August 19, 2016. Absent further direction from the Court at a pre-motion conference or otherwise, any dispositive motions must be filed by September 16, 2016.

Dated: September 28, 2015
New York, New York

/s/ Jayant W. Tambe
Jayant W. Tambe
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*Attorneys for Debtors and
Debtors in Possession*

Dated: September 28, 2015
New York, New York

/s/ Dennis H. Tracey, III
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*Attorneys for QVT Fund LP and
Quintessence Fund L.P.*

Dated: October __, 2015
New York, New York

SO ORDERED

UNITED STATES BANKRUPTCY JUDGE